

JAFFE EXHIBIT 130

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)
)
Plaintiff,)
)
vs.) Case No.
) 3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
)
Defendants.)

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VIDEOTAPED DEPOSITION OF WILLIAM GROSSMAN
San Francisco, California
Friday, March 24, 2017
Volume I

Reported by: SUZANNE F. GUDELJ
CSR No. 5111
Job No. 2577640
PAGES 1 - 54

1 A No.

2 Q Elaborate.

3 A Because as I --

4 MR. JAFFE: Sorry. Objection. Form.

5 BY MR. GONZALEZ: 10:15:26

6 Q Can you clarify what you mean?

7 A Can you repeat the question?

8 Q Yeah. You said you thought it was
9 interesting because of the nature of the content.

10 A Yes. 10:15:40

11 Q So I will use your words. What did you
12 mean when you said "the nature of the content"?

13 A Well, after looking at the content in more
14 detail, I realized that it was very similar to -- to
15 Waymo's -- some of Waymo's laser systems. 10:15:57

16 Q So what was similar?

17 A The shape of the board.

18 Q I don't have an engineering degree, so I
19 want to make sure I'm understanding what you're
20 saying. If you look -- I see some pictures on the 10:16:15
21 last two pages of this exhibit. Is that what you're
22 referring to?

23 A Yes.

24 Q And what is it about the shape of the board
25 that you found interesting? 10:16:27

Page 16

1 A It looked very similar to designs we have
2 in-house.

3 Q And how do you know that?

4 A I know that because previously I had talked
5 with the laser team, and I'd -- I just happened to 10:16:42
6 have a conversation about this particular part of
7 the system. And it's -- it's a very striking shape,
8 and you just remember it, and so when I saw it, I
9 immediately recognized it.

10 Q Was there anything in particular about the 10:16:58
11 shape that -- that caught your attention?

12 A The angles and sides of the PCB.

13 Q Was there anything else that you found
14 interesting about the email and document other than
15 the shape? 10:17:17

16 A No.

17 Q And when you say "the shape," again, I'm
18 just trying to make sure I understand you.

19 A Yep.

20 Q We'll take the one on the last page. The 10:17:29
21 last page of the exhibit has one -- what do you call
22 this, a board?

23 A Yeah, a PCB.

24 Q Okay. PCB?

25 A Yeah. 10:17:39